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Attorneys for Defendants
SEAMASTER LOGISTICS, INC. and
TOLL GLOBAL FORWARDING
(AMERICAS)

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

11 MITSUI O.S.K. LINES, LTD.,

12 Plaintiff,

13 vs.

14 SEAMASTER LOGISTICS, INC., et al.,

15 Defendants,

16 MITSUI O.S.K. LINES, LTD.,

17 Plaintiff,

18 vs.

19 SEAMASTER LOGISTICS, INC., et al.,

20 Defendants,

21 AND RELATED COUNTERCLAIMS.
22

Case No.: 10 CV 5591 SC (JSC)

**STIPULATION RE: EXTENSION OF
BRIEFING DEADLINES; ~~PROPOSED~~
ORDER**

Case No.: 11 CV 2861 SC (JSC)

1 Plaintiff Mitsui O.S.K. Lines, Ltd. (“MOL”) and defendants SeaMaster Logistics, Inc.,
2 Toll Global Forwarding (Americas) Inc., formerly known as Summit Logistics International, Inc.
3 (collectively “SeaMaster”) stipulate to an order changing time that will extend the briefing
4 deadlines of their respective Motions for Attorneys Fees and Bills of Costs.

5 Whereas,

- 6 1. On April 4, 2013, MOL filed a Motion for Attorney Fees and Bill of Costs in
7 Case No. CV 11 2861 SC and SeaMaster filed a Motion for Attorney Fees and
8 Bill of Costs in Case No. CV 10 5591 SC;
- 9 2. Under local rule, the current date for filing an opposition to each motion is April
10 18, 2013 and the current date for filing a reply in support of each motion is seven
11 days later (April 25, 2013);
- 12 3. The current briefing schedule has resulted in significant calendar conflicts for
13 SeaMaster’s counsel, including that she will be totally unavailable from April 10
14 through April 17, one day before SeaMaster’s opposition and objections must be
15 filed;
- 16 4. Counsel have met and conferred and have agreed to the following changes that do
17 not conflict with their schedules:

18

	<u>Current Date</u>	<u>Proposed Date</u>
Oppositions/Objections	April 18, 2013	April 26, 2013
Replies	April 25, 2013	May 10, 2013

22

- 23 5. There have been two prior stipulated requests to enlarge time in this case (a
24 November 2011 request to continue a mediation deadline to allow the parties to
25 pursue more discovery, and a March 2012 request for more time for Defendants
26 to respond to the Second Amended Complaint).
- 27 6. The proposed changes to the briefing schedule will not affect the hearing date of
28 May 24, 2013; and

7. The proposed changes to the briefing schedule will not reduce the amount of time set forth in local rule for the Court to consider the briefs before the hearing date.

SO STIPULATED.

DATED: April 8, 2013

EMARD DANOFF PORT TAMULSKI & PAETZOLD LLP

Eric Danoff
Katharine Essick

By /s/ Katharine Essick
Katharine Essick

Attorneys for Defendants
SEAMASTER LOGISTICS, INC. and TOLL GLOBAL
FORWARDING (AMERICAS) INC.

DATED: April 8, 2013

FLYNN DELICH & WISE LLP

Erich P. Wise
Conte C. Ciala

By /s/ Erich P. Wise
Erich P. Wise

Attorneys for Plaintiff
MITSUI O.S.K. LINES, LTD.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: 04/09/2013

United States District Court

